DAEMS GROUP

GRIEVANCE PROCEDURES

In accordance with RJC requirements, DAEMS GROUP BV has implemented a complaints and grievance protocol that enables the company to handle complaints and grievances in several areas (including, but not limited to, human rights, supply chain, corruption, discipline, discrimination, health and safety issues, etc.).

DAEMS GROUP BV is open to (anonymous) feedback from all stakeholders, both internal and external, regarding any concerns they would have about the businesses, organisations, individuals or activities in our supply chain. It also serves as an extra tool to identify and react to issues that might otherwise go unnoticed.

PROCEDURES

1. **Reception**
   All grievances can be received through the following media :
   a. **Email**: we've dedicated rjc@daemsgroup.com to all communication around grievances and we have shared this information on our website.
   b. **Letter-box**: we have an internal letterbox where employees can flag ideas around improvements and/or any grievances anonymously.
   c. **Posted mail**: whistleblowers may also send anonymous letters on any grievances they might want to report.
   d. **In person**: any grievances may also be shared in person to our ombudsperson, Michel Daems.

2. **Registration**
   Grievances will be entered into a grievance LOG and reported to the Compliance Manager (Luc Smits). The following information must be provided:
   a. Date of reception;
   b. Reception mode (telephone, letter, courier, parcel, email, …);
   c. Issuer and receiver.

3. **Description**
   The person receiving the complaint shall provide a brief but adequate description.

4. **Management Meeting**
   The normal chain of command shall be followed in designating the person responsible for handling the complaint or grievance, depending on the nature and seriousness of the complaint.

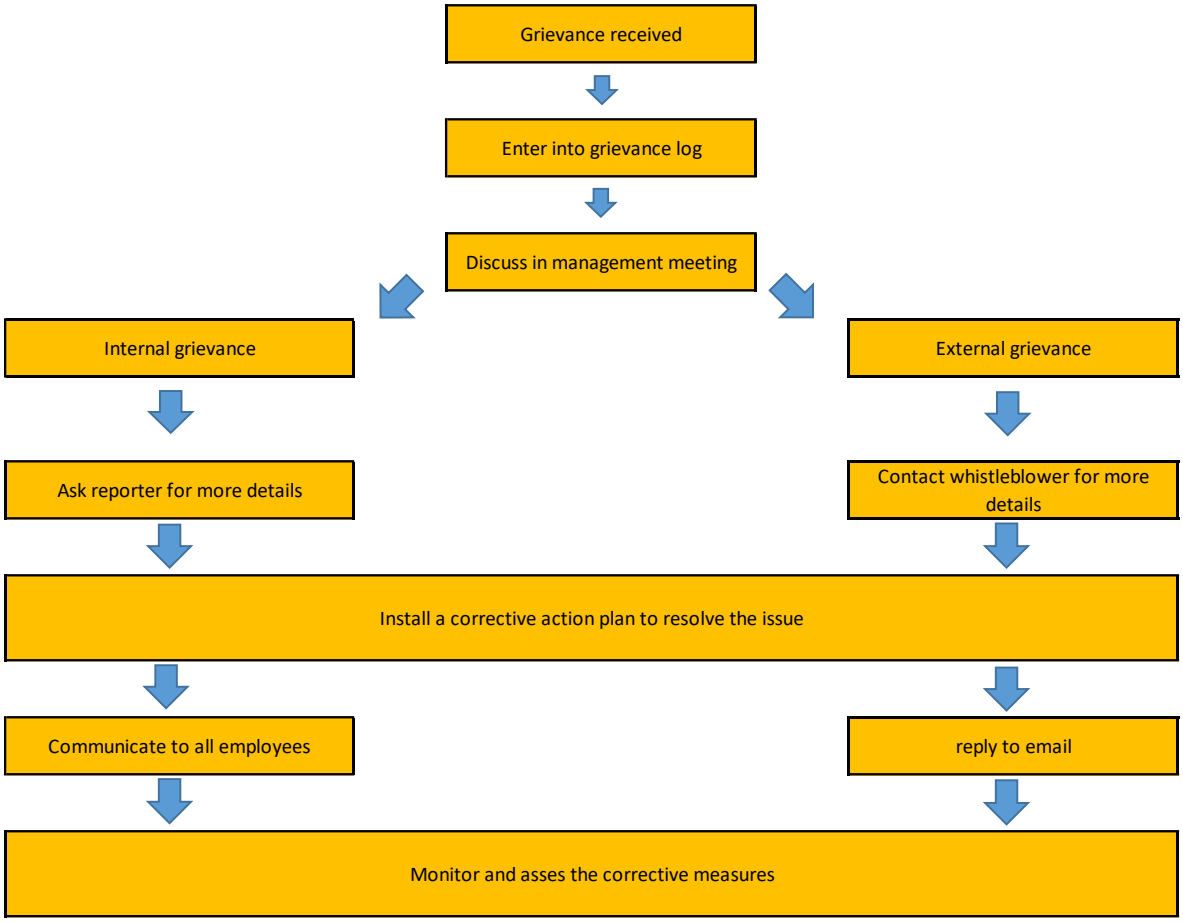
5. **Initial Response**
   A response (preferably in writing) will be sent to the complainant within five working days, indicating that the complaint has been received by the company. The company will indicate the date on which the complainant will receive a solution/response addressing the root cause of the complaint.

6. **Corrective Action**
   Depending on the nature of the raised concerns, we will discuss a solution internally or – if possible and required – ask the whistleblower for more details. We will work together with our affected suppliers to resolve the issues and offer guidance or training if necessary. We will respond to all grievances with corrective action and/or, if required due to the nature of the flagged problem, temporarily suspend or even terminate the cooperation with the affected part of our supply chain.

7. **Monitoring**
   We will continue to monitor and asses the corrective measures that have resulted from our inquiry. Daems Group BV ensures that no disciplinary sanction or any direct or indirect retaliatory measure is taken against persons who have made use of our grievance channels in good faith, even if the facts subsequently prove to be inaccurate or unfounded and/or do not give rise to any proceedings or sanctions.

8. **Closure**
   The complaint and grievance procedure will be closed when a member of management closes it, indicating the date of final closure.

PROCESS FLOW



RESPONSIBILITY AND SIGNATURE SECTION

Overall responsibility for this Policy resides with the CEO of Daems Group BV.

Signed on January 2026 by the Chief Executive Officer, Daems Giovanni.

